IN THE UNITED STATES DISTRICT COURT FOR THE MIDDLE DISTRICT OF TENNESSEE

Motion GRANTED.

HANOVER AMERICAN INSURANCE COMPANY A/S/O CHRISTIAN EDUCATION INC./ EZELL-HARDING CHRISTIAN SCHOOL

Plaintiff

CIVIL ACTION

v.

Case 3:13-cv-01078 District Judge Aleta A. Trauger

DILLINGHAM & SMITH MECHANICAL AND SHEET METAL CONTRACTORS D/B/A "DILLINGHAM & SMITH"

and

CARRIER CORPORATION

Defendants

MOTION FOR PERMISSION TO APPEAR TELEPHONICALLY

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Comes now Vlad Kushnir, Esq., counsel for the Plaintiff, and respectfully requests permission from the Court to appear telephonically for the Case Management Conference scheduled for February 24, 2014 because of a serious illness is said counsel's family. In support of the instant Motion, Vlad Kushnir, Esq. states the following:

- 1. I am nationwide counsel for the Plaintiff in the instant matter.
- 2. I am admitted *Pro Hac Vice* and I am the attorney most familiar with the Plaintiff's case.
- 3. Approximately two (2) months ago, my father passed away after a very long battle with cancer.
 - 4. As a result, my mother is now undergoing treatment for clinical depression.
 - 5. Approximately two (2) weeks ago, a new drug was prescribed to my mother in